

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

RENETTO, LLC,)	
)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:07-cv-00789-GBL-TCB
)	
PROFESSIONAL SALES AND)	
MARKETING GROUP, INC.,)	
)	
Defendant.)	

**DEFENDANT'S PROFESSIONAL SALES AND MARKETING GROUP, INC.'S
MOTION TO DISMISS FOR LACK OF PERSONAL JURISDICTION
OR TO CHANGE VENUE**

Defendant Professional Sales and Marketing Group, Inc. ("PSM"), pursuant to Fed. R. Civ. P. 12(b)(2), moves to dismiss the complaint filed by Plaintiff Renetto LLC ("Renetto") for Lack of Personal Jurisdiction. Because PSM is an Illinois corporation that conducts no business in Virginia related to this cause of action, this Court has no basis to assert jurisdiction over PSM under Virginia's long-arm statute. Additionally, PSM's minimal contacts with Virginia are not sufficient to satisfy the Due Process clause of the Constitution, and accordingly this Court cannot constitutionally assert jurisdiction over PSM.

Alternatively, PSM moves, pursuant to 28 U.S.C. § 1404, to change the venue of this action to the United States District Court for Northern District of Illinois. PSM filed a lawsuit against Renetto in Illinois on June 13, 2007, almost two months before Renetto initiated this action. Renetto's claims in this actions are based upon the same agreements and transactions that form the basis of PSM's Illinois lawsuit, and could have been filed as counterclaims there. Thus, this Court should transfer this action to the United States District Court for Northern District of

Illinois so that it may be consolidated with PSM's previously filed and currently pending action in that court.

The reasons and basis for these motions is set forth more fully in PSM's concurrently filed Memorandum in Support of Defendant's Motion to Dismiss for Lack of Personal Jurisdiction or to Change Venue, which is incorporated as if fully set forth herein.

Respectfully submitted,

POL SINELLI SHALTON FLANIGAN
SUELTHAUS PC

/s/ William D. Blakely
William D. Blakely
VA Bar No. 24415
555 12th Street, NW, Suite 710
Washington, DC 20004
Telephone: (202) 626-8310
Fax: (202) 783-3535
wblakely@polsinelli.com

*Attorney for the Defendant
Professional Sales and Marketing Group, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing pleading was served by () U.S. Mail, postage prepaid; () fax; () Federal Express; (**Electronic Notification**); and/or () hand delivery this 12th day of October, 2007, to:

Anthony Francis Vittoria
VA Bar No. 41132
Ober Kaler Grimes & Shriver
120 E Baltimore Street, 8th Floor
Baltimore, MD 21202-1643
Telephone: (410) 685-1120
Fax: (410) 547-0699
afvittoria@ober.com

Attorney for the Plaintiff
Renetto, LLC

/s/ William D. Blakely
William D. Blakely
VA Bar No. 24415
Polsinelli Shalton Flanigan Suelthaus PC
555 12th Street, NW, Suite 710
Washington, DC 20004
Telephone: (202) 626-8310
Fax: (202) 783-3535
wblakely@polsinelli.com

Attorney for the Defendant
Professional Sales and
Marketing Group, Inc.